

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

In Re:

Deborah K. Chmielewski

Debtor(s).

Chapter 13

Case No. 14-52654

Judge Shapero

**DEBTOR'S RESPONSE TO CP FEDERAL CREDIT UNION'S
OBJECTIONS TO CONFIRMATION**

NOW COMES the Debtor, by and through counsel, and hereby responds to CP Federal Credit Union's ("CP") objections as follows:

1. No response is necessary to paragraph one, as it paraphrases a Bankruptcy Code section.
2. No response is necessary to paragraph two, as it describes a Sixth Circuit Court of Appeals holding.
3. Debtor denies the allegations in paragraph three as untrue, and states further that speculation rarely constitutes fact.
4. Debtor denies the allegations in paragraph four as untrue and states further that
 - a. The described real property was sold to Debtor's son, who paid about \$26,000.00 to his parents for the home. The home was transferred via quit claim deed on April 17, 2014, once all payments were tendered (see attached deed). Debtor does admit that the transfer was not disclosed on her Statement of Financial Affairs; however, that omission shall be corrected.
 - b. Debtor asserts that the described 1973 Honda motorcycle was non operational and sold about five years ago for parts; but the Debtor is unsure of the exact date of sale.
 - c. Debtor believes that the described 2012 Ford is the same vehicle disclose on her Schedule B.
 - d. Debtor asserts that the 2012 Ameri Hauler Trailer was traded for a 2013 Legend trailer; and that collateral was subsequently returned to the creditor (see attached letter from Case Credit Union).

5. Debtor is unable to respond to the allegations set forth in paragraph five, as they are vague and misleading.
6. Debtor denies the allegations set forth in paragraph six and states further that the facts as stated therein are purely speculative.
7. Debtor cannot respond to the allegations set forth in paragraph seven, as she does not possess the necessary occult powers to divine the intention of spirits; but she does strongly assert that she filed the present case in good faith.

WHEREFORE, Debtor requests that this Honorable Court overrule CP's Objections to Confirmation as frivolous and disingenuous; and allow her case to continue unimpeded by empty speculation.

Dated: October 31, 2014



Paul A. Bork (P56385)
Attorney for Debtors
P.O. Box 40581
Redford, MI 48240
(313) 541-2609
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STATE OF MICHIGAN - JACKSON COUNTY
 Received 07/22/2014 11:32 am 2039452
 Processed 07/22/2014 12:43:05 PM DOC
 Arlene L. Rippe, Clerk/Registrar of Deeds

QUIT CLAIM DEED

KNOW ALL MEN BY THESE PRESENTS: That MICHAEL J. CHMIELEWSKI and NATASHA S. CHMIELEWSKI, husband and wife and DEBORAH K. CHMIELEWSKI, a woman, survivor of herself and her deceased husband, JOSEPH P. CHMIELEWSKI,

Quit Claims to: MICHAEL J. CHMIELEWSKI and NATASHA S. CHMIELEWSKI, husband and wife,

whose address is: 5800 Hinkley Road, Stockbridge, Michigan 49285,

the following described premises situated in the Township of Waterloo, County of Jackson, and State of Michigan, to-wit:

AT
2
A parcel of land in the East ½ of the Northeast ¼ of fractional Section 3, Town 1 South, Range 2 East, Waterloo Township, Jackson County, Michigan, described as beginning at a point North 89 degrees 29' 05" West 1055.00 feet, thence South 00 degrees 52' 45" West 1687.7 feet, thence North 89 degrees 05' 30" East 387.90 feet, thence South 05 degrees 18' 12" East 146.54 feet, thence North 89 degrees 10' 03" East 140.33 feet distant from the Northeast corner of said Section 3; thence South 18 degrees 11' 22" East 265.10 feet to the centerline of Territorial Road, thence South 88 degrees 14' 54" East 170.54 feet along said centerline to the intersection of Hinkley Road (formerly M-52); thence North 16 degrees 11' 22" West 273.08 feet along the centerline of Hinkley Road; thence South 89 degrees 10' 03" West 168.24 feet to the point of beginning.

Property Address: 5800 Hinkley Road, Stockbridge, Michigan
 Property Tax ID#: 000-05-03-226-025-00

THIS INSTRUMENT IS EXEMPT FROM THE TAX IMPOSED BY THE STATE REAL ESTATE TRANSFER TAX ACT (MCLA 207.521 ET SEQ) PURSUANT TO MCLA 207.526(a) AND THE TAX IMPOSED BY CONVEYANCES OF REAL PROPERTY ACT (MCLA 207.501 ET SEQ) PURSUANT TO MCLA 207.505(5)(a).

NOTE: The Death Certificate of Joseph P. Chmielewski is being recorded simultaneously herewith.

for the full consideration of _____ LESS THAN ONE HUNDRED (\$100.00) DOLLARS _____

Signed and Seated:

Dated: April 17th, 2014

Michael J. Chmielewski

Natasha S. Chmielewski

Deborah K. Chmielewski, a woman, survivor
 of herself and her deceased husband,
 Joseph P. Chmielewski,



Our service. Your success.

9/11/2014

Deborah Chmielewski
806 20th St
Jackson, MI 49203

Regular Mail
Certified Mail # 7013 1710 0000 1012 9224

RE: 827400-020 Collateral: 2013 Legend 8,526 VIN: 1L9TMV261D1317960

Dear Ms. Chmielewski:

Please be advised that the above referenced collateral sold at a private sale for \$7,800.00

ON sofa?
FLYer

STATEMENT OF APPLICATION OF PROCEEDS OF SALE

Balance prior to sale: Principal	\$19,714.51
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Credits:	Collateral Sale	\$7,800.00
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Balance	\$ 11,914.51
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Expenses:

Sale Fee:	\$468.00
Statement Due Fee:	\$405.00
TOTAL EXPENSES:	\$873.00

Balance	\$12,787.51 plus interest and late fees
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If you are currently involved in a bankruptcy case or the debt outlined above was/is included in a bankruptcy case, this is NOT a demand for payment.

This notice will be sent to the following other people who have an interest in the above noted collateral or who owe money under your agreement: N/A

Sincerely,

Anyssa
Resolutions Specialist
517.393.7710 ext 1094

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

In Re:

Deborah K. Chmielewski
Debtor(s).

_____ /

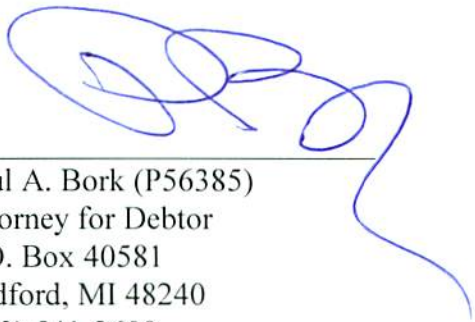
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CERTIFICATE OF SERVICE

Paul A. Bork, attorney for Debtor, states that on November 8, 2006, he served a copy of Debtor's Response To CP Federal Credit Union's Objections To Confirmation to the parties stated below by first class U.S. Mail.

Butler and Butler
24525 Harper Ave
St. Clair Shores, MI 48080

Dated: October 31, 2014



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(313) 541-2609